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18 *Attorneys for Plaintiff/Counter-Defendants*

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 UNIVERSAL ENTERTAINMENT
22 CORPORATION, a Japanese corporation,

23 Plaintiff,

24 vs.

25 ARUZE GAMING AMERICA, INC., a Nevada
26 corporation, KAZUO OKADA, an individual,

27 Defendants.

28 ARUZE GAMING AMERICA, INC., a Nevada
corporation, KAZUO OKADA, an individual,

1 Counter-Claimants,

vs.

2 UNIVERSAL ENTERTAINMENT
3 CORPORATION, a Japanese corporation,
4 ARUZE USA, a Nevada corporation, and JUN
5 FUJIMOTO, an individual,

6 Counter-Defendants.

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20 **Case No.: 2:18-CV-00585 (RFB)(NJK)**

21 **JOINT STIPULATION TO EXTEND
22 TIME FOR PLAINTIFF TO PRODUCE
23 DOCUMENTS REQUIRED BY THE
24 COURT'S ORDER DATED
25 SEPTEMBER 1, 2020 (ECF NO. 223)
26 (FIRST REQUEST)**

1 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff Universal
2 Entertainment Corporation (“UEC”), Counter-defendants Aruze USA, Inc. and Jun Fujimoto (UEC
3 and Mr. Fujimoto are collectively referred to as “UEC Parties”), and Defendants Aruze Gaming
4 America, Inc. and Mr. Kazuo Okada, by and through their respective counsel of record, and pursuant
5 to LR IA 6-1 and LR 26-3, that the time for the UEC Parties to produce certain documents and logs
6 of other documents not being produced, as required by the Court’s Order dated September 1, 2020
7 (ECF No. 223) (“the Order”), shall be extended from December 1, 2020 to February 1, 2021. This is
8 the first stipulation for extension of time regarding compliance with the Order.

9 There is good cause for this extension. Since the hearing held on September 1, 2020, the UEC
10 Parties represent that their attorneys and employees have devoted thousands of hours to compliance
11 with the Order. As of the date of this stipulation, UEC has produced more than 6,700 documents and
12 logged more than 3,800 documents pursuant to the Order, including documents and logs produced on
13 the date of this stipulation. While the UEC Parties represent they will be close to completing their
14 production of documents required by the Order from corporate-owned accounts and devices by
15 December 1, the UEC Parties represent that they primarily need additional time to complete their
16 production of documents required by the Order from Mr. Fujimoto’s personal accounts and devices
17 as well as from devices under his care, custody or control, due to the number of accounts at issue and
18 various technical and logistical difficulties that have been encountered. The UEC Parties agree that
19 they will make rolling productions of documents and logs required by the Order every 20 days during
20 the time remaining for compliance with the Order, beginning on the date of this stipulation.

21 Finally, while the Order also requires that the limited deposition of Counter-Defendant Jun
22 Fujimoto be taken by March 1, 2021, and overall fact discovery is scheduled to end on April 30,
23 2021, the Parties are simultaneously submitting a Joint Status Report addressing the fact that
24 depositions are highly unlikely to be possible by either March 1 or April 30 due to the Covid-19
25 pandemic and will be seeking the Court’s guidance regarding deadlines for depositions. The Parties
26 respectfully submit, therefore, that the extension sought here will not adversely affect the remainder
27 of the schedule in this case.

1 Accordingly, for good cause showing, the parties have agreed to the foregoing extension.

2 Dated this 24th day of November, 2020.

3 EVANS FEARS & SCHUTTERT LLP

HOLLAND & HART LLP

5 By: /s/ Jay J. Schuttert

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19 IT IS SO ORDERED:



20
21 RICHARD F. BOULWARE, II
22 United States District Judge
23 DATED this 25th day of November, 2020.
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Universal Entertainment Corporation v. Aruze Gaming America, Inc., et al.
Case No. 2:18-cv-00585-RFB-NJK

*Stipulation and Order to Extend Time For Plaintiff to Produce Documents Required by the Court's Order Dated September 1, 2020 (ECF No. 223)
(First Request)*

ORDER

IT IS SO ORDERED.

UNITED STATES DISTRICT COURT JUDGE/
UNITED STATES MAGISTRATE JUDGE

DATED: _____

Case No.: 2:18-CV-00585-RFB-NJK